

REMARKS/ARGUMENTS

Original claims 1-3, 5-10 and 12 are amended by this Amendment. Original claims 4 and 11 are canceled by this Amendment. New dependent claims 13 - 18 have been added. After amendment, there is a total of 16 claims pending in the application (claims 1 - 3, 5 - 10, and 12 - 18), of which two claims, claims 1 and 8, are independent. Accordingly, because there are fewer than the twenty total claims (including not more than 3 independent claims) already paid for with the original application filing fee, pending in the application after entry of this Amendment, no additional claims fees are believed due at this time

In the Office Action, the Specification was objected to in that certain elements mentioned at page 7, lines 5-7 with regard to Fig. 1, are actually shown in Fig. 2, and that certain elements at page 7, line 17, mentioned by number are shown in Fig. 1, while other elements mentioned by letter acronym are shown in Fig. 2.

It is believed that the bases for the Examiner's objection to the specification mentioned above have been overcome by the amendments to pages 7 and 8 of the specification, set forth herein above, which clarify the references to the drawings.

In the Office Action, the Drawings were objected to as failing to comply with 37 CFR 1.84(p)(5) because certain reference signs (here, acronyms SSP/IP and LAN) are shown in the drawings (here, Fig. 2), which reference signs are not mentioned in the description.

It is respectfully submitted that the bases for the Examiner's objection to the drawings are overcome by the amendment to the specification at page 10, first full paragraph, as set forth hereinabove, which more clearly identifies the acronyms. It is submitted that this amendment to clarify and identify the indicated acronyms does not introduce any new matter into the application and that the aforesaid two acronyms are supported by their depiction in original

drawing Fig. 2, together with the assertion that those acronyms are known to persons of ordinary skill in the art. No Amendments to the drawing figures themselves are necessary in view of the foregoing.

In the Office Action, claims 1 and 8 were objected to by the Examiner because the term "one of between" was alleged to be unclear.

This basis for the Examiner's objection to those claims is overcome by the amendments to the claims presented hereinabove.

In the Office Action, the Examiner rejected claims 1-4 and 6-11 under 35 U.S.C. 102 (e) as being anticipated by U.S. Patent No. 6,163,809 to Buckley ("Buckley"). Specifically, with regard to claims 1 and 8, the Examiner has stated that Buckley discloses a system and method that include means for receiving a message from a first network and for providing the received message to a second network, as recited in Buckley at col. 9, line 38, where the status notification information is transferable together with the message within the network in a manner transparent to the network (Buckley at col. 3, lines 60-64). The Examiner also has stated that Buckley also shows means for storing data in a data store that may be a database (Buckley at col.12, lines 53-56), and means for allowing a message to transit or exchange with a foreign network and return to the original network (Buckley at col. 13, lines 57-63).

The Applicants respectfully disagree with the Examiner conclusions regarding this reference.

Buckley fails to teach or suggest a system and method that operates on subscriber data as does the system and method of the present application. As used in the present application, subscriber data refers to subscriber location data and subscriber service data (present application at page 9 lines 5-6, and lines 14-15). In Buckley, however, the system and method relate only to

delivery status notification or delivery receipt of the message being transmitted from one network to another. In Buckley, the receipt information is intended only to provide feedback regarding the ultimate status of the delivery of the email message, such as providing notification to a sender of an email message when the email message is delivered to its intended destination (Buckley; column 2 lines 3-1 1).

Buckley further fails to teach or suggest a telecommunication network management system according to the present application. The telecommunication network management system of the present application encompasses and is applicable to individual duplex telecommunications networks within the telecommunication system including a circuit-switched network, such as a public telephone network, a digital multi-service network, a public mobile communication network, a paging network, a message service network, a telex network, and to a packet-switched network such as an internet protocol-based network (present application; page 3 lines 14-17). In contrast, Buckley discloses only computer networks between which e-mail messages are transmitted. As is known to those skilled in the art, the computer networks disclosed by Buckley, such as Local Area Networks, Wide Area Networks, Internet and SMTP-networks, are all only packet-switched networks (Buckley; cols. 1 - 2).

Buckley further fails to teach or suggest the transparent linking feature of the system and method of the present application. The transparent linking aspect of the system and method of the present application relates to the ability of the system and method of the present invention to manage and direct telecommunications messages among multiple types of duplex telecommunication networks that are part of the overall telecommunication system without the need to make changes in the architecture of the existing networks in order to accomplish the linking of the various networks (present application; page 3 lines 19-20). Buckley however

discloses carrying along preserved delivery status information with a message in such a way that the network is not caused to generate delivery notifications (Buckley; col. 3 lines 60-66).

Buckley further fails to teach or suggest using a single logical database for storing subscriber data as does the system and method of the present application. The single logical database of the present application relates to a database the data in which may be distributed among different network elements of the telecommunications system, while still essentially forming part of an entity (present application; page 4 lines 1-4). Buckley only discloses a data store that may be a database (Buckley; col. 12, line 53), which, absent more by way of explicit disclosure in that reference, is not a database as in the system and method of the present application .

The foregoing mentioned features of the system and method of present application are significant because they make possible the object of the invention, i.e. they allow subscriber data. and network-provided or accessible services to be made available among different networks (both circuit-switched and packet-switched); and, wherein the services can be directed to use the network currently serving the subscriber irrespective of the particular network interface. Thus, the features of the-present application disclosed above allow an accessibility service that is operable between different networks (both circuit-switched and packet-switched) having different data types and architectures (present application; page 3 lines 6-11); whereas Buckley merely allows preserving delivery status notification information as an email message transits between various packet-switched computer networks.

In the Office Action, the Examiner also rejected claims 5 and 12 of the present application under 35 U.S.C. 103(a) as being unpatentable for obviousness over Buckley in further view of U.S. Patent No. 5,761,662 to Dasan ("Dasan"). Specifically, regarding claims 5

and 12, the Examiner contends that Buckley discloses all of the limitation of claims 1 and 8. Although the Examiner indicates that Buckley fails to disclose means of forming a service profile for a subscriber of one of the networks, the Examiner further contends that Dasan does disclose an automatic method and system for retrieving information based on a user-defined profile (Dasan at col. 2, lines 3-5). Accordingly, the Examiner contends that it would have been obvious to a person of skill in the art at the time the invention was made to modify the system of Buckley according to Dasan to provide for a service profile for a subscriber. The Examiner asserts that one of ordinary skill in the art would have been motivated to make such a combination in order to retrieve a subset of the information from a database based upon which information is of interest to the user, as specified in the user-defined profile (Dasan at col. 2, lines 13-17).

It is respectfully submitted that the system and method of the present application have been shown to patentably distinguish over Buckley in the foregoing arguments. Therefore, even if one were to assume that Dasan discloses certain of the isolated features of the system and method of the present application, such as the creation of a subscriber profile, which the Examiner has relied on in combination with the general disclosure in Buckley to allege anticipation of claims 5 and 12 of the present application, applicants respectfully assert that even if such a combination were obvious to a person of ordinary skill in the art at the time the present invention was made, the result would be different from the system and method according to the present application because of the fundamental differences between the system and method of the present application and those of Buckley, as discussed above.

Applicants request entry of this Amendment and accompanying Remarks into the file of the subject application and request further examination and consideration of the application in

light thereof. It is respectfully submitted that the system and method of the present application, as recited according to the amended claims presented hereinabove, are not anticipated by, nor are they obvious in view of, Buckley and Dasan, taken individually or in combination; and that amended claims 1 - 3, 5 - 10, and 12 and new claims 13 -18 of the present application patentably distinguish over the cited references and are in-condition-for-allowance, the early notification of which is earnestly solicited.

This Amendment is being submitted within the original three month shortened period for response. It is believed that no fees or charges are required at this time in connection with the present application; however, if any fees or charges are required at this time, they may be charged to our Patent and Trademark Office Deposit Account No. 03-2412.

Respectfully submitted,

COHEN, PONTANI, LIEBERMAN & PAVANE

By 

Lance J. Lieberman
Reg. No. 28,437
551 Fifth Avenue, Suite 1210
New York, New York 10176
(212) 687-2770

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